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September 12, 2023

**L.Civ.R. 7.1(d)(5) AUTOMATIC EXTENSION LETTER**

**Via CM/ECF Filing**

Melissa E. Rhoads, Esq., Clerk  
United States District Court - District of New Jersey  
Martin Luther King, Jr. Federal Bldg. & Courthouse  
50 Walnut Street, Room 4015  
Newark, NJ 07101

**Re: IUOE Local 825 v. International Longshoremen's Association, et al.**  
**Civil Action No.: 2:23-cv-03689-KM-JRA**

Dear Ms. Rhoads:

We represent Plaintiff in this matter. Pursuant to L.Civ.R. 7.1(d)(5), we hereby invoke the provisions of this Rule for an automatic extension of time to file our opposition to Defendants' motion to dismiss Plaintiff's Amended Complaint. (Docket Entry No. 13).

The original return date of Defendants' motion was October 2, 2023. This originally-noticed motion day has **not** previously been extended or adjourned. This letter invoking the provisions of L.Civ.R. 7.1(d)(5) has also been filed before the date on which Plaintiff's opposition papers would otherwise be due under L.Civ.R. 7.1(d)(2). The **new return date of the motion is October 16, 2023**, which is the next available motion day following the originally-noticed date.

I hereby certify that on this date this letter was sent for electronic filing with your office and for electronic service upon all counsel. Thank you for your attention to this matter.

Respectfully submitted,  
**DeCotiis, FitzPatrick, Cole & Giblin, LLP**

By:   
Alexander Hemsley, III, Esq.

AH3/  
cc: All counsel of record (via CM/ECF)